

FILED 04 DEC 03 13:25 USDC-ORM

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

v.

STANISLAS GREGORY MEYERHOFF,
JOSEPHINE SUNSHINE OVERAKER, and
CHELSEA DAWN GERLACH,

Defendants.)

SEALED

Case No. CR

04-60116-AA

INDICTMENT

[18 USC §§ 1366(a) and 371

THE GRAND JURY CHARGES:

COUNT 1

Destruction of an Energy Facility - Conspiracy

On or about December 30, 1999, in the County of Deschutes, State and District of Oregon, the defendants STANISLAS GREGORY MEYERHOFF, JOSEPHINE SUNSHINE OVERAKER, and CHELSEA DAWN GERLACH willfully conspired and agreed together and with each other and with persons both known and unknown to the grand jury to knowingly and willfully damage and attempt to damage the property of an energy facility of the United States, to wit: a Bonneville Power Administration tower, involved in the transmission and distribution of electricity near the City of Bend, Oregon, in an amount exceeding or which would have exceeded \$100,000.

In violation of Title 18, United States Code, Sections 1366(a) and 371.

Count 2

Destruction of an Energy Facility

On or about December 30, 1999, in the County of Deschutes, State and District of Oregon, the defendants STANISLAS GREGORY MEYERHOFF, JOSEPHINE SUNSHINE OVERAKER, CHELSEA DAWN GERLACH, and others both known and unknown to the grand jury to knowingly and willfully damage and attempt to damage the property of an energy facility of the United States, to wit: a Bonneville Power Administration tower, involved in the transmission and distribution of electricity near the City of Bend, Oregon, in an amount exceeding or which would have exceeded \$100,000.

In violation of Title 18, United States Code, Sections 1366(a).

SENTENCING ENHANCEMENT ALLEGATIONS

As to counts 1 and 2, the defendants are subject to a sentence enhancement under U.S.S.G. §3A1.4, Terrorism, because the offenses are felonies that involved, or was intended to promote, a federal crime of terrorism as defined in 18 U.S.C. §2332b(g)(5).


DATED this 3rd day of December, 2004.

A TRUE BILL.


FOREPERSON

Presented by:

KAREN J. IMMERGUT
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